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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN CARLOS URIAS-TORRES,

Defendants.

CASE NO. 1:23-CR-00099-BLW-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is trailing behind the defendant's other case, U.S. v. Leiva-Leiva, 1:22-cr-00232, set in front of Judge Winmill on September 8, 2025.

2. Time has previously been excluded through July 23, 2025.

3. The parties wish to **continue the status conference to September 8, 2025.**

4. Case ending 232, in which defendant is charged with RICO Conspiracy and VICAR Murder, is more serious than the instant case and the resolution of the lead case will materially impact the resolution of this case.

5. The defendant agrees to exclude time through September 8, 2025, inclusive.

6. The parties agree and stipulate, and request that the Court find the following:

a) The discovery associated with this case includes investigative reports,

1 photographs and videos, as well as cellular phone extractions. All this discovery has been either
2 produced directly to counsel and/or produced to a court-appointed discovery coordinator, and/or
3 made available for inspection and copying.

4 b) Counsel for defendant desire additional time to consult with her client, conduct
5 investigation, review the voluminous discovery, prepare for a possible trial, and explore a
6 potential resolution of the case.

7 c) Counsel for defendant believes that failure to grant the above-requested
8 continuance would deny him/her the reasonable time necessary for effective preparation, taking
9 into account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of July 23, 2025, through September
16 8, 2025 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii), and
17 B(iv) because the case is so unusual or so complex, due to the number of defendants, the nature
18 of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to
19 expect adequate preparation for pretrial proceedings or for the trial itself within the time limits
20 established by this section. This stipulation also results from a continuance granted by the Court
21 at defendant's request on the basis of the Court's finding that the ends of justice served by taking
22 such action outweigh the best interest of the public and the defendant in a speedy trial.

23 7. Nothing in this stipulation and order shall preclude a finding that other provisions of the
24 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
25 must commence.

1 IT IS SO STIPULATED.

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4 Dated: May 21, 2025

MICHELE BECKWITH
Acting United States Attorney

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6 /s/ Robert L. Veneman-Hughes
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney

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8 Dated: May 21, 2025

/s/ Adilene Flores Estrada
ADILENE FLORES ESTRADA
Counsel for Defendant
Juan Carlos Urias-Torres

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13 **ORDER**

14 IT IS SO ORDERED that time is excluded from July 23, 2025 to September 8, 2025 pursuant to
15 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii).

16 IT IS SO ORDERED.

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18 Dated: May 27, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE